

WILMER CUTLER PICKERING HALE
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Special Counsel to the Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

**AMENDED² ELEVENTH MONTHLY FEE STATEMENT OF WILMER CUTLER
PICKERING HALE AND DORR LLP FOR COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS SPECIAL
COUNSEL TO THE DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD
FROM SEPTEMBER 1, 2020 THROUGH SEPTEMBER 30, 2020**

Name of Applicant	Wilmer Cutler Pickering Hale and Dorr LLP
Applicant's Role in Case	Special Counsel to Purdue Pharma L.P., <i>et al.</i>
Date Order of Employment Signed	November 25, 2019 [Docket No. 544]
Period for which compensation and reimbursement is sought	September 1, 2020 through September 30, 2020

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products, L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

² This amended fee statement is being filed to correct an error with respect to the rates that were applied. WilmerHale increased its standard billing rates for certain professionals effective as of September 1, 2020 and negotiated a reduction of those rates with the Debtors. However, the new rates were not implemented correctly in our firm's accounting system at the time that the related invoices for services rendered in September 2020 were generated.

Summary of Total Fees and Expenses Requested	
Total compensation requested in this statement	\$7,032.90 ³ (80% of \$8,791.12)
Total reimbursement of expenses requested in this statement	\$84.92
Total compensation and reimbursement requested in this statement	\$7,117.82
This is a(n): <input checked="" type="checkbox"/> Monthly Application <input type="checkbox"/> Interim Application <input type="checkbox"/> Final Application	

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (the “**Local Rules**”), the *Order Authorizing the Retention and Employment of Wilmer Cutler Pickering Hale and Dorr LLP as Special Counsel for the Debtors Nunc Pro Tunc to the Petition Date*, dated November 25, 2019 [Docket No. 544] (the “**Retention Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Docket No. 529] (the “**Interim Compensation Order**”), Wilmer Cutler Pickering Hale and Dorr LLP (“**WilmerHale**”), special counsel for the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), submits this *Eleventh Monthly Fee Statement for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from September 1, 2020 Through September 30, 2020* (“**Fee Statement**”).⁴ By this Fee Statement, WilmerHale seeks (i) compensation in the amount of \$7,032.90 which is 80% of the total amount of reasonable compensation for actual, necessary legal services that WilmerHale incurred in connection with such services during the Fee Period (i.e., \$8,791.12), and (ii)

³ This amount reflects an agreed reduction in fees in the aggregate amount of \$1,551.38.

⁴ The period from September 1, 2020 through and including September 30, 2020 is referred to herein as the “**Fee Period**.”

payment of \$84.92 for the actual, necessary expenses that WilmerHale incurred in connection with rendering such services during the Fee Period.

Itemization of Services Rendered and Disbursement Incurred

1. Attached hereto as **Exhibit A** is a chart of the number of hours expended and fees incurred (on an aggregate basis) by WilmerHale partners, associates, law clerks and paraprofessionals during the Fee Period with respect to each of the project categories WilmerHale established in accordance with its internal billing procedures. As reflected in **Exhibit A**, WilmerHale incurred \$10,342.50 in fees during the Fee Period and, pursuant to its agreement with Purdue Pharma, L.P., reduced that amount to \$8,791.12. Pursuant to this Fee Statement, WilmerHale seeks compensation for 80% of such fees, totaling \$7,032.90.

2. Attached hereto as **Exhibit B** is a chart of WilmerHale professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Fee Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Fee Period is \$1,301.76.⁵ The blended hourly billing rate of all paraprofessionals is \$389.15.⁶

3. Attached hereto as **Exhibit C** is a chart of expenses that WilmerHale incurred or disbursed in the amount of \$84.92 in connection with providing professional services to the Debtors during the Fee Period. These expense amounts are intended to cover WilmerHale's direct operating costs, which costs are not incorporated into WilmerHale's hourly billing rates. Only the clients for whom the services are actually used are separately charged for such services. The effect of including such expenses as part of the hourly billing rates would unfairly impose

⁵ The blended hourly billing rate of \$1,301.76 for attorneys is derived by dividing the total fees for attorneys of \$4,816.50 by the total hours of 3.70.

⁶ The blended hourly billing rate of \$389.15 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$5,526.00 by the total hours of 14.20.

additional cost upon clients who do not require extensive photocopying, delivery and other services.

4. Attached hereto as **Exhibit D** are the related invoices showing the time records of WilmerHale for the Fee Period organized by project category with a daily time log describing the time spent by each attorney and other professional during the Fee Period as well as an itemization of expenses.

Notice

5. WilmerHale will provide notice of this Fee Statement in accordance with the Interim Compensation Order. WilmerHale submit that no other or further notice be given.

WHEREFORE, WilmerHale, in connection with services rendered on behalf of the Debtors, respectfully requests (i) compensation in the amount of \$7,032.90, which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that WilmerHale incurred in connection with such services during the Fee Period (i.e., \$8,791.12), and (ii) payment of \$84.92 for the actual, necessary expenses that WilmerHale incurred in connection with such services during the Fee Period.

Dated: December 2, 2020

By: /s/ George W. Shuster, Jr.
WILMER CUTLER PICKERING
HALE AND DORR LLP

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7 World Trade Center
New York, NY 10007
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*Special Counsel to the Debtors and Debtors
in Possession*

Exhibit A

Fees By Project Category

Project Category	Total Hours	Total Fees
Fee/Employment Applications (B160)	5.70	3,331.00 ¹
Analysis/Strategy related to Congressional Investigation (L120)	12.20	7,011.50
Total	17.90	\$10,342.50
Less Agreed Reduction		-\$1,551.38
GRAND TOTAL	17.90	\$8,791.12

¹ This amount relates to time spent preparing the monthly fee statement for July 2020 (and does not relate to time for this fee statement). In addition, this amount does not include additional time expended by the partner responsible for supervising the preparation of fee statements and fee applications, which time is not billed to the client but rather absorbed by the firm.

Exhibit B

Professional & Paraprofessional Fees

Professional	Position, Year Assumed Position, Year of Obtaining Relevant License to Practice, Area of Expertise	Hourly Billing Rate (as negotiated) ¹	Total Hours Billed	Total Compensation
Partners				
Reginald Brown	Partner; joined firm in 1997; admitted to DC Bar and FL Bar since 1998; Regulatory and Government Affairs.	1,550.00	2.50	3,875.00
Partners Total			2.50	\$3,875.00
Counsel				
John T. Byrnes	Counsel; joined firm in 2013; admitted to NY Bar since 2013 and DC Bar since 2014; Government & Regulatory Litigation.	955.00	0.30	286.50
Counsel Total			0.30	\$286.50
Associates				
Sheila E. Menz	Sr. Associate; joined firm in 2014; admitted to CA Bar since 2015 and DC Bar since 2017; Regulatory and Government Affairs.	860.00	0.20	172.00
Allyson M. Pierce	Associate; joined firm in 2019; admitted to CA Bar in 2019; Bankruptcy & Financial Restructuring.	690.00	0.70	483.00
Associates Total			0.90	\$655.00
Paraprofessionals				
William E. Lannon	Paralegal; joined firm in 2015; Litigation / Controversy.	385.00	3.20	1,232.00
Elizabeth W. Rockett	Legislative Assistant; joined firm in 2015; Regulatory and Government Affairs.	275.00	6.30	1,732.50

¹ WilmerHale increased its standard billing rates for certain professionals effective as of September 1, 2020 and negotiated a reduction of those rates with the Debtors.

Professional	Position, Year Assumed Position, Year of Obtaining Relevant License to Practice, Area of Expertise	Hourly Billing Rate (as negotiated)¹	Total Hours Billed	Total Compensation
Yolande Thompson	Sr. Paralegal; joined firm in 2005; Bankruptcy & Financial Restructuring.	545.00	4.70	2,561.50
Paraprofessionals Total			14.20	\$5,526.00
TOTAL			17.90	\$10,342.50
Less Agreed Reduction				-\$1,551.38
GRAND TOTAL			17.90	\$8,791.12

Exhibit C

Summary of Actual and Necessary Expenses

Expense Category	Total Expenses
Court Services	70.00
Federal Express	14.92
TOTAL	\$84.92

Exhibit D

Detailed Time Records and Expenses



1875 Pennsylvania Avenue, NW
Washington, DC 20006
wilmerhale.com

FEDERAL TAX ID No. [REDACTED]
(800) 526-6682(t)
(937) 395-2200(f)

Colleen MacDonald
Purdue Pharma, L.P.
One Stamford Forum
Stamford, CT 06901-3431

Invoice Date 11/24/20
Invoice No. 2611238
Matter No. 1653300-00137

FOR LEGAL SERVICES RENDERED through September 30, 2020 in connection with the Fee and Retention Applications matter, as detailed on the attached.

Total Legal Services	\$	3,331.00
Less 15% Discount		-499.65
Total Disbursements		<u>84.92</u>
Total Amount Due	\$	<u>2,916.27</u>

PLEASE NOTE:

**In preparation for our fiscal year-end, please remit payment by Monday December 28, 2020.
If you have a fiscal year-end billing deadline, please advise us by emailing
WHFinanceClientAccounting@wilmerhale.com. Thank you, in advance.**

DUE UPON RECEIPT

Please remit payment with remittance information by ACH or wire to:

Account Number: [REDACTED]

Routing Number: [REDACTED]

Citibank NA 1101 Pennsylvania Avenue NW, 9th Floor Washington, DC 20004
FBO WILMER CUTLER PICKERING HALE AND DORR LLP

For check payments, please remit to: P.O. Box 7247-8760 Philadelphia, PA 19170-8760
Please send all correspondence to: WHFinanceClientAccounting@wilmerhale.com

Wilmer Cutler Pickering Hale and Dorr LLP

Beijing Berlin Boston Brussels Denver Frankfurt London Los Angeles New York Palo Alto San Francisco Washington

Wilmer Cutler Pickering Hale and Dorr LLP is a Delaware limited liability partnership Our United Kingdom offices are operated under a separate Delaware limited liability partnership

Client No. 1653300
Matter No. 1653300-00137

Purdue Pharma, L.P.
Fee and Retention Applications

Invoice No. 2611238
Invoice Date 11/24/20
Legal Services through September 30, 2020

Colleen MacDonald
Purdue Pharma, L.P.
One Stamford Forum
Stamford, CT 06901-3431

Date	Timekeeper	Hours	Description
09/01/20	Pierce, Allyson	0.10	Email LEDES data for eighth monthly fee statement as requested
09/01/20	Thompson, Yolande	0.10	Emails with Ms. Kennedy re LEDES file for June 2020
09/01/20	Thompson, Yolande	0.10	Emails with Ms. Pierce re data for June 2020 requested by fee examiner
09/01/20	Thompson, Yolande	0.20	Review LEDES file for June 2020
09/01/20	Thompson, Yolande	0.10	Review email from Ms. Pierce transmitting data for June 2020 to Ms. Nobis
09/02/20	Thompson, Yolande	0.10	Email to Ms. MacDonald at Purdue re omnibus order approving agreed reduction in fees
09/02/20	Thompson, Yolande	0.10	Review Omnibus Order Granting Second Interim Fee Applications
09/14/20	Thompson, Yolande	0.10	Emails with Ms. Pierce re July 2020 Fee Statement with exhibits for attorney review
09/14/20	Thompson, Yolande	1.60	Prepare Monthly Fee Statement with related exhibits for July 2020
09/14/20	Thompson, Yolande	0.60	Review invoices to ensure compliance with bankruptcy guidelines
09/15/20	Pierce, Allyson	0.20	Review draft of July fee statement
09/15/20	Pierce, Allyson	0.10	Email draft of July fee statement to Messrs. Byrnes, Shuster, and Ms. DaCunha
09/15/20	Thompson, Yolande	0.10	Review email from Ms. Pierce transmitting July 2020 fee statement with exhibits to other attorneys for review
09/23/20	Byrnes, John T.	0.30	Review draft fee statement
09/24/20	Pierce, Allyson	0.10	Review and respond to email from Mr. Byrnes with edits to monthly fee statement
09/24/20	Pierce, Allyson	0.20	Review and respond to emails from Ms. Thompson

Client No. 1653300
Matter No. 1653300-00137

Purdue Pharma, L.P.
Fee and Retention Applications

Invoice No. 2611238
Invoice Date 11/24/20
Legal Services through September 30, 2020

Date	Timekeeper	Hours	Description
			and Mr. Shuster re edits to monthly fee statement
09/24/20	Thompson, Yolande	0.10	Serve fee statement upon notice parties via email
09/24/20	Thompson, Yolande	0.10	Download, update files with filed fee statement and related Certificate of Service
09/24/20	Thompson, Yolande	0.10	E-file Certificate of Service
09/24/20	Thompson, Yolande	0.20	E-file Ninth Monthly Fee Statement
09/24/20	Thompson, Yolande	0.10	Emails with Ms. Pierce re revised fee statement
09/24/20	Thompson, Yolande	0.10	Review email from Mr. Byrnes re July fee statement
09/24/20	Thompson, Yolande	0.30	Revise, finalize July 2020 fee statement
09/24/20	Thompson, Yolande	0.10	Emails with Mr. Shuster re revisions to fee statement
09/24/20	Thompson, Yolande	0.20	Prepare Certificate of Service for fee statement
09/24/20	Thompson, Yolande	0.10	Email finalized fee statement to attorneys for approval
09/24/20	Thompson, Yolande	0.10	Coordinate with Office Services re sending hard copies of filed fee statement to Chambers and notice parties
09/24/20	Thompson, Yolande	0.10	Prepare service materials
Total		<u>5.70</u>	

Client No. 1653300

Purdue Pharma, L.P.

Matter No. 1653300-00137

Fee and Retention Applications

Invoice No. 2611238

Invoice Date 11/24/20

Legal Services through September 30, 2020

Date	Cost	Description
09/10/20	70.00	Court Costs, Yolande Thompson, 08/26/20, INV: 4266645609101328; Payment for Mr. Shuster's telephonic participation in August 26, 2020 hearing. COURTSOLUTIONS NEW YORK NY
09/14/20	14.92	Federal Express Corp; Invoice# 710299893 (Aug-25,2020); Inv#710299893 395934531520 Thompson, Yolande TO United States Bankruptcy Court Honorable Robert D Drain WHITE PLAINS NY -- Michelle Leonard
Total	<u>84.92</u>	

Client No. 1653300
Matter No. 1653300-00137

Purdue Pharma, L.P.
Fee and Retention Applications

Invoice No. 2611238
Invoice Date 11/24/20
Legal Services through September 30, 2020

LEGAL SERVICES

Timekeeper	Hours	Rate	Total
Byrnes, John T.	0.30	955.00	286.50
Pierce, Allyson	0.70	690.00	483.00
Thompson, Yolande	4.70	545.00	2,561.50
Total Legal Services	5.70		\$3,331.00

DISBURSEMENTS

Description	Total
FEDERAL EXPRESS	14.92
COURT SERVICES	70.00
Total Disbursements	\$84.92



1875 Pennsylvania Avenue, NW
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(937) 395-2200(f)

Colleen MacDonald
Purdue Pharma, L.P.
One Stamford Forum
Stamford, CT 06901-3431

Invoice Date 11/24/20
Invoice No. 2611239
Matter No. 1653300-00136

FOR LEGAL SERVICES RENDERED through September 30, 2020 in connection with the Post
Bankruptcy: House Energy & Commerce Inquiry matter, as detailed on the attached.

Total Legal Services	\$	7,011.50
Line Item Discount		<u>-1,051.73</u>
Total Amount Due	\$	<u>5,959.77</u>

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WHFinanceClientAccounting@wilmerhale.com. Thank you, in advance.**

DUE UPON RECEIPT

Please remit payment with remittance information by ACH or wire to:

Account Number: [REDACTED]

Routing Number: [REDACTED]

Citibank NA 1101 Pennsylvania Avenue NW, 9th Floor Washington, DC 20004
FBO WILMER CUTLER PICKERING HALE AND DORR LLP

For check payments, please remit to: P.O. Box 7247-8760 Philadelphia, PA 19170-8760
Please send all correspondence to: WHFinanceClientAccounting@wilmerhale.com

Wilmer Cutler Pickering Hale and Dorr LLP

Beijing Berlin Boston Brussels Denver Frankfurt London Los Angeles New York Palo Alto San Francisco Washington

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Client No. 1653300
Matter No. 1653300-00136

Purdue Pharma, L.P.
Post Bankruptcy: House Energy & Commerce Inquiry

Invoice No. 2611239
Invoice Date 11/24/20
Legal Services through September 30, 2020

Colleen MacDonald
Purdue Pharma, L.P.
One Stamford Forum
Stamford, CT 06901-3431

Date	Timekeeper	Hours	Description
L120 - Analysis/Strategy			
09/01/20	Brown, Reginald	0.50	Participate in [REDACTED]
09/01/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]
09/02/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]
09/03/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]
09/08/20	Brown, Reginald	0.50	Participate in [REDACTED]
09/08/20	Rockett, Elizabeth W.	0.40	Complete [REDACTED]
09/09/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]
09/10/20	Rockett, Elizabeth W.	0.40	Complete [REDACTED]
09/11/20	Rockett, Elizabeth W.	0.40	Complete [REDACTED]
09/14/20	Rockett, Elizabeth W.	0.40	Complete [REDACTED]
09/15/20	Brown, Reginald	0.60	Participate in [REDACTED]
09/15/20	Rockett, Elizabeth W.	0.20	Complete [REDACTED]
09/16/20	Lannon, William E.	0.40	File [REDACTED]
09/16/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]
09/17/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]

Client No. 1653300
Matter No. 1653300-00136

Purdue Pharma, L.P.
Post Bankruptcy: House Energy & Commerce Inquiry

Invoice No. 2611239
Invoice Date 11/24/20
Legal Services through September 30, 2020

Date	Timekeeper	Hours	Description
09/18/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]
09/20/20	Menz, Sheila E.	0.10	Strategize with [REDACTED]
09/21/20	Lannon, William E.	2.80	Analyze [REDACTED]
09/21/20	Menz, Sheila E.	0.10	Confer with [REDACTED]
09/21/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]
09/22/20	Brown, Reginald	0.50	Participate in [REDACTED]
09/22/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]
09/23/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]
09/24/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]
09/25/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]
09/28/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]
09/29/20	Brown, Reginald	0.10	Emails re [REDACTED]
09/29/20	Brown, Reginald	0.30	Participate in [REDACTED]
09/29/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]
09/30/20	Rockett, Elizabeth W.	0.30	Complete [REDACTED]
		12.20	

Client No. 1653300
Matter No. 1653300-00136

Purdue Pharma, L.P.
Post Bankruptcy: House Energy & Commerce Inquiry

Invoice No. 2611239
Invoice Date 11/24/20
Legal Services through September 30, 2020

LEGAL SERVICES

Timekeeper	Hours	Rate	Total
Brown, Reginald	2.50	1,550.00	3,875.00
Menz, Sheila E.	0.20	860.00	172.00
Lannon, William E.	3.20	385.00	1,232.00
Rockett, Elizabeth W.	6.30	275.00	1,732.50
Total Legal Services	12.20		\$7,011.50

Task	Description	Hours	Value
L120	Analysis/Strategy	12.20	7,011.50
Total Legal Services		12.20	\$7,011.50